

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/25/2022

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern

Tel: (212) 571-5500
Fax: (212) 571-5507

Rachel Perillo

MEMO ENDORSED

October 25, 2022

By ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Terrence Williams
21 Cr. 603 (VEC)

Dear Judge Caproni:

I represent Terrence Williams in the above-referenced matter. Mr. Williams is scheduled to be sentenced on January 25, 2023. I write without objection from the government, by AUSA Ryan Finkel, respectfully requesting an adjournment of sentence to the spring of 2023 due to my current trial obligations before the Honorable Vernon S. Broderick in the matter of *United States v. Sayfullo Saipov*, 17 Cr. 722 (VSB). The *Saipov* matter is a complex terrorism case with a death-eligible defendant. We are currently in the middle of jury selection, and trial is expected to last until February 2023. I therefore seek an adjournment of Mr. Williams' sentencing to a date in mid-to-late spring 2023, which should provide me with enough time to prepare Mr. Williams' sentencing memorandum after my trial obligations have ended.

Additionally, a draft presentence report was filed on October 18, 2022, and our objections are currently due on November 1, 2022. Due to my current trial schedule, additional time is needed to review the presentence report with Mr. Williams to determine if any objections or corrections need to be made. For this reason, I respectfully request a 30-day

extension of the deadline to submit objections to the presentence report.

If the Court has any questions regarding this application, please do not hesitate to contact me.

The Court's time and attention to this matter is appreciated.

Respectfully submitted,
/s/
David Stern

cc: AUSA Daniel Nessim
AUSA Ryan Finkel
(By ECF)

Application GRANTED.

The sentencing hearing in this matter is rescheduled for **Tuesday, April 4, 2023, at 11:00 A.M.** The parties' pre-sentencing submissions are due no later than **March 21, 2023.**

SO ORDERED.

 10/25/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE